

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Joshua Winer,)
Plaintiff,)
v.)
Umaymah Mohammad, AJP Educational)
Foundation, Inc. A/K/A American Muslims)
For Palestine, WESPAC Foundation, Inc.,)
Sean Eren as the representative of National)
Students for Justice in Palestine, Doctors)
Against Genocide Society, Cair-Nga Inc.)
A/K/A/ CAIR-Georgia, CAIR Foundation)
Inc., A/K/A Council on Islamic Relations)
or CAIR, Rupa Marya, Ibrahim Jouja as)
representative of Emory Students for)
Justice in Palestine,)
Defendants.)
)

**PLAINTIFF JOSHUA WINER'S MOTION REQUESTING ACCEPTANCE
OF LATE FILING**

Plaintiff respectfully moves this Court to accept his brief in opposition to Defendant Cair-Nga Inc.'s motion to dismiss his first amended complaint, which was entered into the Court's ECF system exactly one minute past the filing deadline. A record of the submission, which includes a time-stamp, is attached

hereto as Exhibit A and provides: "the following transaction was entered by Israelovitch, Lauren on 7/22/2025 at 0:00 AM EDT and filed on 7/22/2025."

The brief was fully prepared and ready for submission prior to the deadline. However, due to an unexpected and momentary technical issue, final submission occurred one minute late. No prejudice has resulted from this brief delay, and the filing was otherwise compliant in all respects.

Accordingly, Plaintiff respectfully requests that the Court excuse the delay and deem the submission timely filed.

Respectfully submitted,

National Jewish Advocacy Center, Inc.

By: /s/ Lauren Israelovitch

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CERTIFICATE OF COMPLIANCE WITH L.R. 5.1

WE HEREBY CERTIFY that (i) the foregoing document and (ii) Plaintiff Joshua Winer's brief in opposition to Defendant's Cair-Nga Inc.'s motion to dismiss Plaintiff's first amended complaint was prepared in Times New Roman, 14-point font, as approved by Local Rule 5.1.

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